

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
AKC - v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
KEONN X IE RODRIGUEZ,	:	
	:	S3 24 Cr. 82 (DLC)
Defendant.	:	
-----	X	

WHEREAS, on or about June 24, 2025, KEONN~~X~~IE RODRIGUEZ (the "Defendant"), was charged in a two-count Superseding Indictment, S3 24 Cr. 82 (DLC) (the "Indictment"), with conspiracy to commit money laundering in violation of Title 18, United States Code, Section 1956(h) (Count One) and with conspiracy to operate an unlicensed money transmitting business in violation of Title 18, United States Code, Section 371 (Count Two);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Two of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offenses charged in Counts One and Two of the Indictment, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offenses charged in Counts One and Two of the Indictment;

WHEREAS, on or about July 30, 2025, the Defendant pled guilty to Count Two of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count Two of the Indictment and agreed to forfeit, pursuant to Title 18, United States Code, Section 982(a)(1), a sum of money equal to \$237,832,360.55 in United States currency, representing all property involved in the offense charged in Count Two of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$237,832,360.55 in United States currency representing the amount of property involved in the offense charged in Count Two of the Indictment that the Defendant personally obtained, for which the Defendant is jointly and severally liable with his co-defendant, William Lonergan Hill (the “Co-defendant”) to the extent a forfeiture money judgment is entered against the Co-defendant for the offense charged in Count Two of the Indictment;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the property involved in the offense charged in Count Two of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence; and

WHEREAS, the Defendant agrees to make a payment to the Government in the amount of \$6,367,139.69 in United States currency (the “Payment”) on or before Defendant’s sentencing date or November 30, 2025, whichever is earlier (the “Payment Date”);

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by NICOLAS ROOS, Acting Deputy United States Attorney, Attorney for the United States, Acting Under Authority Conferred by 28 U.S.C. § 515, Assistant United States Attorneys Andrew K. Chan, David R. Felton, and Cecilia Vogel, of counsel, and the Defendant and his counsel, Michael Krouse, Esq., that:

1. As a result of the offense charged in Count Two of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$237,832,360.55 in United States currency (the “Money Judgment”), representing the amount of property involved in the offense charged in Count Two of the Indictment, for which the Defendant is jointly and severally liable with his Co-defendant, to the extent a forfeiture money judgment is entered against the Co-

Defendant for the offense charged in Count Two of the Indictment, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant KEONNE RODRIGUEZ, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. The Defendant shall make the Payment on or before the Payment Date.

4. Upon receipt of the Payment on or before the Payment Date made by the Defendant or Co-defendant, the Government shall deem the Money Judgment to be fully satisfied.

5. In the event, Defendant fails to make the Payment by the Payment Date, the entire Money Judgment shall be due, and the United States may take action pursuant to Title 21, United States Code, Section 853(p) up to the entirety of the outstanding Money Judgment.

6. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38th Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

7. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

8. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

9. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

10. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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11. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

NICOLAS ROOS

Acting Deputy United States Attorney
Attorney for the United States
Acting Under Authority Conferred by
28 U.S.C. § 515

By:



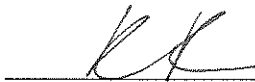
Andrew K. Chan
David R. Felton
Cecilia Vogel
Assistant United States Attorneys
26 Federal Plaza
New York, NY 10278
(212) 637-1072 / 2299 / 1084

7/30/25

DATE

KEONNE RODRIGUEZ

By:




KEONNE RODRIGUEZ

7/30/25

DATE

By:



Michael Krouse, Esq.
Attorney for Defendant
ARNOLD & PORTER

7/30/2025

DATE

SO ORDERED:


HONORABLE DENISE L. COTE
UNITED STATES DISTRICT JUDGE

July 30, 2025

DATE